

SHELBY DUKE GOZA^{0*}
H. SCOT SPRAGINS**
GOODLOE T. LEWIS^{0*}
DAWN DAVIS CARSON**
J. BRIAN HYNEMAN^{0*}
LAWRENCE J. TUCKER, JR.*
HANK SPRAGINS**
JASON R. HOLLINGSWORTH**
DYLAN J. GILLESPIE**
CHRISTINA R. HADAWAY***

⁰ MS State Bar Approved Mediator

* Licensed in MS

** Licensed in MS and TN

*** Licensed in MS, TN and GA

HICKMAN, GOZA & SPRAGINS, PLLC

ATTORNEYS AT LAW
1305 MADISON AVENUE
POST OFFICE BOX 668
OXFORD, MISSISSIPPI 38655-0668
TELEPHONE: 662-234-4000
FACSIMILE: 662-234-2000
WEB SITE: www.HICKMANLAW.com
E-Mail: glewis@hickmanlaw.com

ROBERT L. SMALLWOOD, JR.
(1909-1954)
CHESTER L. SUMNERS
(1896-1959)
LOWELL E. GRISHAM
(1925-1982)
WILL A. HICKMAN
(1924-2008)
THOMAS R. ETHRIDGE
(1918-2010)

May 25, 2022

Robert Mims
Office of the US Attorney
900 Jefferson Avenue
Oxford, MS 38655
robert.mims@usadoj.gov

Re: United States of America v. Jamarr Smith, et al.
U.S.D.C. for the Northern Dist. of MS; Oxford Div.; No. 3:21-CR107-NBB-RP
Our File No.: 21-7126

Dear Robert:

Thank you for your prompt response to my previous discovery request. I am afraid I have one additional discovery request at this time.

1. As to Todd Matney, Inspector, U.S. Postal Inspection Service, please advise if he consulted with legal counsel before submitting the application for a search warrant on or about November 8, 2018.
2. As to Todd Matney, Inspector, U.S. Postal Inspection Service, please advise how many previous applications for a geofence search warrant he had presented to a Judge before November 8, 2018.
3. As to the applications for search warrant in the previous question, please state how many of those previous applications were approved and how many were rejected.
4. Please state whether Magistrate Judge Roy Percy read the application for search warrant, and if so, how long he took to read it.
5. As to Todd Matney, inspector, U.S. Postal Inspection Service, please state what training or instruction, if any, he received as to the scientific and/or technical basis for and purpose of geofence search warrants prior to November 8, 2018.

Exhibit "G"

MEMPHIS OFFICE
119 SOUTH MAIN STREET, SUITE 500
MEMPHIS, TN 38103
TELEPHONE: 901-881-9840
FACSIMILE: 844-256-0993

HERNANDO OFFICE
115 WEST CENTER STREET
HERNANDO, MS 38632
TELEPHONE: 662-298-4152
FACSIMILE: 844-256-0993

MADISON OFFICE
115 HOMESTEAD DRIVE
MADISON, MS 39110
TELEPHONE: 601-853-1774
FACSIMILE: 662-234-2000

HICKMAN GOZA & SPRAGINS, PLLC

May 25, 2022

Page 2

6. Please provide the policies, procedures and training consulted by or provided to Todd Matney, Inspector, U.S. Postal Inspection Service, before November 8, 2018 concerning geofence search warrants.
7. Please provide the template or form used by Todd Matney, Inspector, U.S. Postal Inspection Service, for the geofence search warrant application in this case.

I appreciate your attention to this matter.

Sincerely,

HICKMAN, GOZA & SPRAGINS, PLLC

A handwritten signature in black ink, appearing to read "Goodloe", written over the printed name.

GOODLOE T. LEWIS

GTL/mh